

EXHIBIT E

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, *et al.*, individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-cv-04688

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**PLAINTIFF ANIBAL RODRIGUEZ'S OBJECTIONS AND RESPONSES
TO DEFENDANT'S THIRD SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Anibal Rodriguez ("Rodriguez") hereby objects and responds to Defendant's, Google LLC ("Google"), Third Set of Interrogatories (No. 6). These objections and responses are made solely for the purpose of and in relation to this action. In addition, the objections and responses set forth in this document are based on Plaintiff Rodriguez's knowledge, investigations, and analysis to date. As discovery proceeds, Plaintiff Rodriguez may become aware of additional facts or evidence and his analysis of the case may change. Plaintiff Rodriguez reserves all rights to supplement and amend these objections and responses accordingly.

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INTERROGATORY NO. 6:

State ALL facts RELATING TO and describing the circumstances in which YOU learned about this ACTION.

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RESPONSE TO INTERROGATORY NO. 6:

Plaintiff Rodriguez objects to this Interrogatory to the extent it calls for privileged attorney client communications.

Subject to and notwithstanding that objection, Plaintiff Rodriguez responds that he was receiving advertisements that seemed linked to his advertisements that seemed to be based on his application activity and web browsing. Those advertisements increasingly focused on his

1 application activity and web browsing the more he used his device. Plaintiff Rodriguez is an
2 acquaintance with Arturo Garcia, an IT specialist at the Miami office of Boies Schiller Flexner
3 LLP, who mentioned that Boies Schiller Flexner LLP was working on a case regarding Google
4 and its Web & App Activity functionality. Thereafter, Plaintiff Rodriguez was introduced to
5 attorneys at Boies Schiller Flexner LLP.
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VERIFICATION

Under penalties of perjury, I declare that I have read the foregoing Plaintiff Anibal Rodriguez's Objections and Responses to Defendant's Third Set of Interrogatories, and that the Answers are true and correct to the best of my knowledge and belief.

By: _____

Printed Name: _____

Title: _____

STATE OF _____

COUNTY OF _____

The foregoing instrument was acknowledged before me this ____ day of _____, 2022, by _____, who has produced as identification _____, bearing number _____, expiring _____ and who did (did not) take an oath.

NOTARY PUBLIC SIGNATURE

Dated: July 13, 2022

MORGAN & MORGAN

/s/ John A. Yanchunis

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PROOF OF SERVICE

I, Ryan J. McGee declare:

I am a citizen of the United States and employed in the County of Hillsborough, Florida. I am over the age of 18 and not a party to the within action; my business address is 201 N. Franklin St., 7th Floor, Tampa, FL 33602.

On July 13, 2022, I served the following document described as:

Plaintiff Anibal Rodriguez's Objections and Responses to Defendant's Third Set of Interrogatories

By electronic mail transmission from rmcgee@forthepeople.com on July 13, 2022, by transmitting a PDF format copy of such document to each person at the e-mail addresses listed below. The document was transmitted by electronic transmission and such transmission was reported as complete and without error:

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Executed on July 13, 2022 at Tampa, Florida.

/s/ Ryan J. McGee